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March 21, 2018

Honorable Debra C. Freeman, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square, Room 705
New York, NY 10007

***Re: Starr Surplus Lines Insurance Company and Houston Casualty
Company v. CRF Frozen Foods, LLC
Civil Action No.: 17-cv-1030 (PGG)***

Dear Judge Freeman:

Plaintiffs Starr Surplus Lines Insurance Company and Houston Casualty Company and defendant CRF Frozen Foods, LLC (“CRF”) by and through their undersigned counsel, submit this joint letter to request a short extension of one additional deadline – extension of the deadline to conduct the deposition of one of CRF’s experts, Dr. Robert L. Buchanan, up to and including April 23, 2018.

As indicated in the parties’ March 16, 2018 joint letter to you, consistent with Judge Gardephe’s Amended Civil Case Management Order (ECF No. 101) (“CMO”), the parties have completed all Phase I fact discovery (subject to the Court’s ruling on pending motions to compel [Doc. No. 98]), have exchanged all Phase I expert reports and were scheduled to complete all Phase I expert depositions by April 11, 2018. By our March 16, 2018 letter, the parties requested that the Court grant a short extension of two deadlines set forth in the CMO:

1. Extending the deadline by which the parties may conduct the expert deposition of Dennis Connolly to April 17, 2018; and
2. Extending by two weeks the deadline for the parties to file post-discovery proposed dispositive motion letters from April 18, 2018 to May 2, 2018 and opposition letters from April 23, 2018 to May 7, 2018.

Another one of those expert depositions, that of Dr. Robert L. Buchanan, was scheduled to occur today, March 21, 2018 in Newark, NJ. Unfortunately, due to extreme weather conditions, that

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deposition had to be postponed. The next date when Dr. Buchanan and all counsel are available is April 23, 2018.

Accordingly, in addition to the relief previously requested in the parties' March 16, 2018 letter, all parties hereby request that the deadline to conduct Dr. Buchanan's deposition be extended from April 11, 2018 to April 23, 2018.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ John A. Nadas
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/s/ Jeffrey S. Weinstein
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SO ORDERED:

Honorable Debra C. Freeman, U.S.M.J.

cc: Hon. Paul G. Gardephe, U.S.D.J.